

Chang, Lisa

Subject: Advice on Swinomish
Location: R10Sea-Room-19Orca/R10-Rooms-Service-Center

Start: Tue 8/4/2015 3:00 PM
End: Tue 8/4/2015 4:00 PM

Recurrence: (none)

Meeting Status: Meeting organizer

Organizer: Chang, Lisa
Required Attendees: Castanon, Lisa; Fournier, Tony
Optional Attendees: Bonifaci, Angela
Resources: R10Sea-Room-19Orca/R10-Rooms-Service-Center

Purpose: to tee up questions that we need a larger (perhaps HQ) perspective on.

Again, at issue is whether the activities of a subawardee (Swinomish Tribe) of the Northwest Indian Fisheries Commission (NWIFC) lead organization cooperative agreement are unallowable from a clear regulatory or policy standpoint. The activities in question involve a website, whatsupstream.com, which will be modified to allow/encourage website visitors to write a letter to their legislator expressing concern with agricultural non-point source pollution.

Questions we would like a larger perspective on:

- 1) Lobbying – issue 1. Although neither the primary or subaward recipient are a non-profit or institute of higher education (IHE), the subawardee appears to want to engage in activities that are prohibited for non-profits and IHEs in 200.450 (see attached e-mail string). Should we be wary of funding this activity?
- 2) Lobbying – issue 2. An added policy consideration that Dan raised is that a fundamental national policy decision was made (and formalized in the CWA) regarding EPA and regulation of NPS pollution. Given that, how would EPA's funding of the Swinomish's "outreach and education" campaign, the ultimate aim of which is to drive citizens to a website that encourages them to click through to generate a letter to their legislator to regulate agricultural non-point source pollution, be seen? Has this kind of situation ever been dealt with in other regions or at HQ?

